

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

*City of Rochester, NY v. Purdue Pharma,
L.P.*, No. 19-op-45853 (Track 12)

*County of Ogdensburg, NY v. Purdue
Pharma, L.P.*, No. 19-op-45825 (Track 22)

MDL 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**OPTUMRX, INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS OPPOSITION
TO MOTION FOR LEAVE TO SERVE SUPPLEMENTAL DISCOVERY
AND CERTAIN EXHIBITS THERETO**

Pursuant to Local Rule 5.2, OptumRx, Inc. seeks leave to file under seal its opposition to the PEC's motion for leave to serve supplemental discovery and Exhibits A, F, G, H, I, and M to that opposition.

OptumRx requests leave to file these documents under seal to ensure there is no inadvertent disclosure of confidential information.

- Exhibit A to OptumRx's opposition brief contains ten years' worth of Highly Confidential – Attorneys' Eyes Only information regarding OptumRx's rebate contract terms, client contract terms, internal processes, and related financial data. The information is proprietary, competitively sensitive, and not otherwise available to the public. That information is trade secret material that would harm OptumRx and OptumRx's clients if disclosed to the public.
- OptumRx's opposition brief and Exhibits F, G, H, I, and M also contain information designated as Confidential by Purdue under the Protective Orders in the MDL. *See* ECF

No. 441, 1357, 2688. OptumRx will file a public version of its opposition brief on the public docket redacting that information.

Accordingly, OptumRx, Inc. respectfully requests leave to file its opposition to the PEC's motion for leave to serve supplemental discovery and Exhibits A, F, G, H, I, and M to that opposition under seal.

Dated: February 18, 2025

/s/ Brian D. Boone

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CERTIFICATE OF SERVICE

I certify that on February 18, 2024, a copy of the foregoing was served on all counsel of record by filing the same with the Court's ECF system.

/s/ *Brian D. Boone*

Brian D. Boone